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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, DENIS
MOLINA, JHONY SILVA, MARIA ELENA
HERNANDEZ, O.C., SANDHYA LAMA,
S.K., TEOFILO MARTINEZ,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 3:25-cv-05687-TLT

**DECLARATION OF MARCOS MIRALDA
IN SUPPORT OF PLAINTIFFS' MOTION
FOR PARTIAL SUMMARY JUDGMENT**

Assigned to: Hon. Trina L Thompson

Date: November 18, 2025

Time: 2:00 p.m.

Place: Courtroom 9

Complaint Filed: July 7, 2025

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DECLARATION OF MARCOS MIRALDA

I, Marcos Miralda, declare:

1. I have personal knowledge of the facts set forth in this declaration. If called upon to testify as a witness, I could and would testify to these facts.

2. I am a citizen of Honduras. I am 56 years old and live in Hesperia, California with my wife and four U.S. citizen children. I came to the United States in February 1995. I have been a TPS holder since 1999, after the designation of Honduras for TPS. TPS has allowed me to live and work in the United States legally for over two decades. Throughout this time, I have had valid work authorization that has enabled me to maintain a stable job, provide health care for my severely disabled child, pay for college tuition for my children, save money to buy a home, guarantee healthcare for myself and my family, and otherwise provide for my family's basic needs. Having TPS has also allowed me to fully participate in my community without living in constant fear of detention or deportation. Losing TPS and the ability to provide for my family not only threatens my livelihood but also the wellbeing and stability of my family.

3. I have four U.S. citizen children, including one of my youngest sons who has a severe brain condition that has made him blind and mute. My oldest daughter is 22 years old and recently married with a veteran of the U.S. Marines. She is studying to be a teacher. My 19-year-old son is currently in college and I help provide for him financially, paying for his college tuition and living expenses. I also have a set of twins who are 15 years old and are currently in high school. One of the twins requires constant medical treatments and interventions because of severe physical disabilities caused by a brain condition he has had since birth.

4. I have been a commercial truck driver since 2007 and have relied on my TPS and work authorization to obtain my commercial driver's license. My wife is a stay-at-home parent and the primary caretaker of our special-needs son. I am the primary breadwinner for my family. Prior to the end of TPS and the loss of my work authorization, I made about \$8,000 a month. Now, I don't even know how I can make \$800 a week to pay for all of my family's necessities.

5. One of my twin boys was born with a severe brain condition that impacts his mobility, ability to eat, ability to talk, and hearing. He has undergone more than 20 surgeries since

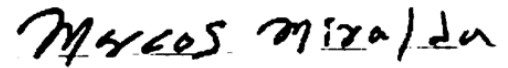
1 birth. From a young age, he has faced health challenges that most children and families never
2 encounter. Our family has been focused on caring for him to the best of our ability. Until recently,
3 my 15-year-old son needed to be fed through a feeding tube. He still depends on diapers. He also
4 recently had surgery to try to gain mobility in his legs, but the surgery was not successful. Each
5 surgery he has undergone has required careful monitoring, long hospital stays, and intensive care at
6 home. This has placed an enormous physical and financial burden on our family. As a commercial
7 trucker, I have been able to cover for the needs of my son but now, without TPS, valid work
8 authorization, or a commercial driver's license, it's unclear how I will provide for his healthcare
9 needs.

10 6. I have also worked tirelessly to make sure my children can pursue higher education
11 without being burdened by the financial stress of tuition. For my two oldest children, I have covered
12 everything—tuition, textbooks, gas, and food—so that they don't have to work and can focus on
13 their studies. I have sacrificed my own personal needs to prioritize my children's education. I worry
14 that losing my job will mean that my son in college will have to pause his studies and work so that
15 we don't lose our home.

16 7. Since learning that TPS was terminated for Honduras, I have lived in constant worry
17 about how I will provide for my family and pay our bills. I also constantly fear being detained or
18 separated from my family, which makes it difficult to take my son to his doctor's appointments or
19 even to leave the house to get fresh air. This anxiety is crushing and affects every aspect of my daily
20 life.

21 8. My anxiety worsened when I was unable to renew my commercial driver's license
22 due to the loss of my TPS. My commercial driver's license was the foundation of my livelihood and
23 the means by which I have provided for my family. When I learned that I could no longer renew it
24 and would be out of a job, I felt devastated, overwhelmed, and uncertain about how I could continue
25 to provide for my family. I started to wonder how I would pay for my son's medical care, whether
26 my own health would worsen because of my stress, whether I'd lose our family home if I couldn't
27 pay the mortgage, and how I would manage our mounting bills without going into bankruptcy. I
28 worry the most about my young son and how to maintain his healthcare.

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2 I declare under penalty of perjury that the foregoing is true and correct, and that this
3 declaration was executed at Hesperia, California, this October 13, 2025.
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